




**DISTRICT OF COLUMBIA
WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)
WORKFORCE IMPLEMENTATION GUIDANCE LETTER (WIGL)**

POLICY & GUIDANCE **INFORMATION & UPDATES**

DATE: May 2, 2022

NO: DC-WIGL-2022-001-WIOAYouthProgramDesignandServiceProvision

TO: LOCAL WORKFORCE DEVELOPMENT SYSTEM STAKEHOLDERS
AMERICAN JOB CENTERS
WIOA YOUTH SERVICE PROVIDERS
WIOA ELIGIBLE TRAINING PROVIDERS
DEPARTMENT OF EMPLOYMENT SERVICES (DOES)
OFFICE OF THE STATE SUPERINTENDENT OF EDUCATION (OSSE)
DEPARTMENT ON DISABILITY SERVICES (DDS)
DEPARTMENT OF HUMAN SERVICES (DHS)
UNIVERSITY OF THE DISTRICT OF COLUMBIA COMMUNITY COLLEGE
(UDC-CC)

FROM: Ahnna Smith 
Executive Director, Workforce Investment Council (DC WIC)

SUBJECT: WIOA TITLE I YOUTH PROGRAM DESIGN AND SERVICE PROVISION

PURPOSE:

To provide guidance on the WIOA requirements for the provision of youth services and the selection of youth service providers, and describe the roles and responsibilities of the DC WIC, the Department of Employment Services, and the Office of Contracting and Procurement in carrying out this policy.

REFERENCES:

WIOA Section 107(10)(B)(i); WIOA Section 107(12)(B)(i); WIOA Section 123; WIOA Section 129(c); 20 CFR §679.430; 20 CFR §681.400; 20 CFR §681.420; 20 CFR §681.460; 20 CFR §681.470; Training and Employment Guidance Letter (TEGL) No. 21-16; DC Law 18-371. Procurement Practices Reform Act of 2010; DC WIOA Unified State Plan; District of Columbia Workforce Investment Council Policy Manual; DC-WIGL-2017-002-WIOAYouthProgramEligibility; All policy guidance to be housed at <http://dcworks.dc.gov>.



BACKGROUND:

Under section 129 of the Workforce Innovation and Opportunity Act (WIOA), the District is required to provide services for eligible youth. The WIOA Youth program prepares vulnerable youth and other job seekers for successful employment, providing services that increase the youth's knowledge of and ability to enter in-demand career pathways. Combinations of services, aligned to meet the interests and abilities of each participant are provided directly to participants or through facilitated connections between participants and other providers through the One-Stop system. Connections may be facilitated through direct referrals or procurement of services when referrals are not available.

In the District of Columbia, the DC Workforce Investment Council (DC WIC) performs all duties and tasks assigned to the State Workforce Development Board and to the Local Workforce Development Board under WIOA. The Department of Employment Services (DOES) is the designated WIOA Title I grant recipient and fiscal agent for the District of Columbia.

On March 2, 2017, DOL published Training and Employment Guidance Letter (TEGL) No. 21-16 which provided guidance on WIOA youth program implementation. This WIGL addresses key provisions in the WIOA law, regulations, and TEGL 21-16, and provides guidance to assist the local area in serving District youth.

YOUTH PROGRAM DESIGN

WIOA outlines the key components of youth program design, and requires local youth programs to provide youth services within this framework:

Objective Assessment (OA). An objective assessment of each youth participant includes a review of the academic and occupational skill levels, as well as the service needs and strengths of each youth for the purpose of identifying appropriate services and career pathways for participants and informing the individual service strategy. Every objective assessment must include an evaluation of these elements:

- **Basic Skills** – standardized testing may be used to evaluate and numeracy skill level, such as the TABE or CASAS, to make this determination for Out-of-School Youth (OSY). For In-School Youth (ISY), the educational institution is to provide an assessment of basic skills including digital literacy. Digital literacy skills may also be assessed.
- **Occupational Skills** – industry- or occupation-specific skills the youth currently has, and/or skill gaps for the youth's desired career.
- **Prior Work Experience** – job experience the youth has gained through gained by previous employment, either paid or unpaid.
- **Employability** – skills that are required to secure and maintain employment, including job readiness skills.
- **Interests** – personal and work-related interests that can help identify potential training and occupational goals. Interest inventories can be utilized to discover interests.
- **Aptitudes** (including interests and aptitudes for nontraditional jobs) – talent and abilities utilized to identify potential training and occupational goals. Career and Aptitude Assessments can be used.
- **Supportive Service Needs** – potential barriers to full and active participation in youth activities, education, and employment.
- **Developmental Needs** – skills needed to develop employment and career potential.

Each element of the objective assessment must be addressed to develop a comprehensive understanding of the youth's individual circumstances and to ensure the program meets the youth's needs. DOES or

another identified service provider must perform an objective assessment on each participant using interviews, questionnaires, standardized tests, recent school records, and other approved assessment tools. When appropriate, the DC WIC encourages DOES and any other youth providers to utilize standardized assessments to strengthen the quality of the youth's objective assessment.

Individual Service Strategy (ISS). An ISS is the plan that identifies short and long-term goals, career pathways that include education and employment goals, and the associated services, timeframes, and outcomes necessary to achieve the goals. Staff should use the results of the objective assessment to develop an ISS for the youth participant that is directly linked to one or more indicators of performance described in WIOA Section 116(b)(2)(A)(ii). The ISS must be completed and signed by the participant and the participant's case manager.¹ For participants under the age of 18, the participant, parent and case manager signatures are required. Those participants receiving education or training leading to a recognized post-secondary credential or employment must identify the skills gains to be measured. Skills gains may be documented by one or more of the following:

- Achievement of at least one educational functioning level for a participant who is receiving instruction below the postsecondary education level;
- Attainment of high school diploma or recognized equivalent secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is meeting the District's academic standards;
- Satisfactory or better progress report, towards established milestones as documented in the training plan (such as completion of OJT or completion of one year of an apprenticeship program or similar milestones) from an employer or training provider who is providing training; and/or
- Successful passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams.

A new objective assessment and/or individual service strategy is not required if the case manager or program provider determines it is appropriate to use a recent objective assessment or individual service strategy developed under another education or training program, if such previous assessments have been conducted within the last six months.

Case Management. Case Management is the infrastructure for delivering effective services that will facilitate the growth and development of a participant and the achievement of their performance goals. The process extends from recruitment through follow-up. The case manager motivates participants and coordinates services and information to prepare youth for post-secondary education opportunities, academic and occupational training or employment and training opportunities as appropriate.

Follow-up Services. Participants will "exit" the program when they have completed the services outlined in the ISS and achieved their goals. Any youth who has not received services for 90 days and is not scheduled for future services, except follow-up services, must exit the program. The exit date is based on the end date of the last service, and follow-up services are provided for a minimum of 12-months following the exit date. Follow-up services include, and are not limited to, monthly contact with the youth to provide assistance with work or training related challenges that may arise; participation in peer support groups; adult mentoring; counseling; assistance in securing a better paying job; additional career development support; and/or other supportive services. DOES and other selected service providers are encouraged to consider the needs and barriers of the program's target population(s) in

¹ WIOA replaced the term "case manager" with "career planner" in a few places and some local areas seem to have adopted the term widely.

determining the appropriate levels and types of follow-up services.

YOUTH PROGRAM ELEMENTS

WIOA specifies 14 youth elements that local youth programs must make available to youth participants:

- Tutoring, study skills training, and instruction leading to secondary school completion, including dropout prevention strategies
- Alternative secondary school offerings or dropout recovery services
- Paid and unpaid work experiences with an academic and occupational education component
- Occupational skill training, with a focus on recognized postsecondary credentials and in-demand occupations
- Leadership development activities (e.g., community service, peer-centered activities)
- Supportive services⁴
- Adult mentoring
- Follow-up services for at least 12 months after program completion
- Comprehensive guidance and counseling, including drug and alcohol abuse counseling
- Integrated education and training for a specific occupation or cluster
- Financial literacy education
- Entrepreneurial skills training
- Services that provide labor market information about in-demand industry sectors and occupations
- Postsecondary preparation and transition activities

DOES is not required to provide every program service to each participant; the specific program services a youth participant receives are based on each participant's objective assessment and individual service strategy. USDOL encourages local programs to partner with existing local, State, or national entities that can provide program elements at no cost to the local youth program.²

YOUTH SERVICE PROVIDER SELECTION

The District's WIOA State Plan must describe the youth program in the local area and how the required 14 program elements will be made available within that framework, including a description of the relationships developed and documented with partner organizations, through memorandum of understanding(s), grants, or contracts, to provide services, as well as relationships that need to be established in order to provide the required youth services. 20 CFR § 681.400 provides Local WDBs with flexibility to determine how to provide youth services most efficiently, and DOL expects Local WDBs to use youth service providers that are best positioned to provide program elements resulting in strong outcomes for participants.

Consistent with 20 CFR § 681.400, DOES, as the grant recipient or designated fiscal agent, may "provide directly some or all of the youth workforce investment activities." This approach allows DOES to directly provide the WIOA youth program services that it can most efficiently and cost-effectively provide, such as labor market and employment information and framework services including intake, assessment, supportive services, and follow-up services.

² While all 14 youth elements must be made available, they do not all have to be funded through WIOA youth funds; partner resources may be leveraged to provide program elements that are available in the local area through other funding streams.

For those program elements not provided directly, the DC WIC must ensure appropriate links to providers of services that will foster the participation of eligible local area youth³ and meet the WIOA referral requirements in WIOA Section 129(c)(3)(A) for all youth participants including:

- Providing participants with information about the full array of applicable or appropriate services available through One Stop partners or eligible providers.
- Referring participants to appropriate training and educational programs which have the capacity to serve them either on a sequential or concurrent basis.
- When a youth applies for enrollment in a program of workforce investment activities and either does not meet the enrollment requirements for that program or cannot be served by that program, the provider of that program must ensure the youth is referred for further assessment, if necessary, or referred to appropriate programs to meet the skills and training needs of the youth.

When grants or contracts are awarded to youth service providers to carry out youth workforce investment activities, the DC WIC has delegated the competitive solicitation process of youth service providers to DOES. DOES with oversight from the DC WIC, shall identify youth service providers using a competitive process based on criteria established in the WIOA State Plan; take into consideration the ability of the provider to meet performance accountability measures based on the primary indicators of performance for youth programs; conduct oversight with respect to such providers; and may terminate for cause the eligibility of such providers.⁴ However, if the DOES determines there are an insufficient number of eligible youth providers in the local area, it may award grants or contracts on a sole source basis subject to prior approval from the DC WIC. (see Section 107(d)(10), Section 123(b), and 20 CFR § 679.370(l)(1)).

PROCUREMENT PROCESS

DC WIC has delegated the responsibility for facilitating the processes of awarding grants or contracts on a competitive basis to DOES.

Procurement Plan. DOES shall submit to DC WIC a proposed plan for youth services procurement, including proposed procurement type, priorities, and timeline by December prior to the following program year. DC WIC will review and provide any feedback on the plan in a timely manner, and within no more than 21 days.

Solicitations. DC WIC and DOES staff shall cooperate in developing Requests for Proposals (RFPs) or Requests for Applications (RFAs), as the case may be, consistent with District procurement and grantmaking laws and regulations, depending on the funding vehicle. DOES will draft and share grant and/or contract solicitations with the DC WIC for review and feedback. DC WIC will review and provide feedback to ensure solicitations align with workforce system priorities

³ Such as local area justice and law enforcement officials; local public housing authorities; local education agencies; local human service agencies; WIOA title II adult education providers; local disability-serving agencies and providers and health and mental health providers; Job Corps representatives; and representatives of other area youth initiatives, such as YouthBuild, and including those that serve homeless youth and other public and private youth initiatives.

⁴ According to the District's Citywide Grants Manual and Sourcebook, grants are generally appropriate where "the principal purpose of the relationship is the transfer of money, property, services, or anything of value to the subgrantee to accomplish a public purpose of support and stimulation authorized by statute, rather than an acquisition of goods or services for the direct benefit of the District government." Because the benefits of the WIOA Youth program are intended to flow to youth participants rather than to the District government, the DC WIC believes the use of a grants process is appropriate.

and implementation of the District's WIOA State Plan. DOES will consider DC WIC's feedback and provide written notification of how recommendations were subsequently incorporated prior to posting the solicitation.

Any solicitation for youth services shall include the following components:

- A description of providers of youth services that are eligible applicants under the solicitation;
- A description of the youth participants eligible to be served under the solicitation;
- A requirement that the applicant provides a program, service or activity required by the District's program design (as described above);
- A requirement that if an eligible youth does not meet the eligibility requirements of the particular program or cannot be served, the provider shall refer such youth to DOES for further assessment, as necessary, and to other appropriate programs to meet the basic skills and training needs of the applicant;
- A description of performance and reporting requirements under the solicitation that aligns with WIOA youth performance requirements;
- A description of award amounts available and payment structures under the solicitation, including the condition under which an award may be renewed;
- A description of the application process to be used by providers seeking funds under the solicitation;
- A description of the review process to be used to select providers under the solicitation;
- A description of any materials or information that a provider must submit in order to demonstrate compliance with federal or District law; and
- Any other information or materials that the DC WIC determines is necessary to carry out its responsibilities in accordance with this policy.

Contracts. DOES will manage the contracting process with applicable direction and assistance from the District of Columbia Office of Contracting and Procurement (OCP). In addition to applicable D.C. procurement regulations and procedures,⁵ DOES and OCP must procure the youth service providers in accordance with the Procurement Standards found at Uniform Guidance at 2 CFR parts 200 and 2900. The Uniform Guidance at 2 CFR 200.317 requires States to adhere to the same procurement procedures it uses for non-Federal funds for procurements using Federal funds when it is responsible for conducting the procurement. Contracts with the selected providers will be reviewed on an annual basis, following local contracting regulations, and renewed when appropriate based on available funding and successful program performance.

Grants. Depending on the source of the grant funding, the terms of the DOL primary grant, if applicable, and in conformity with applicable Federal and District laws and regulations, DOES may issue grants to youth services providers. Subject to those legal requirements, when appropriate DOES will also utilize the policies and procedures for implementing best practices in grants management as detailed in the Citywide Grants Manual and Sourcebook.⁶ DC WIC Board members may serve on grant review panels, barring a conflict of interest.

PROVIDER AGREEMENTS

If a program element is not funded with WIOA title I youth funds, DOES must have an agreement in

⁵ DC Law 18-371. Procurement Practices Reform Act of 2010.

⁶ The Office of Internal Services manages the development and implementation of the [Citywide Grants Manual and Sourcebook](#).

place with the partner organization to ensure that the program element will be offered and is closely connected and coordinated with the WIOA youth program. OCP shall be responsible for negotiating contracts and DOES shall be responsible for developing grant agreements with each awarded contractor or grantee, consistent with the terms of the solicitation. Memorandum of understanding, contracts and grants shall be duly executed by the required parties pursuant to District law and regulation.

PAYMENTS

The Department of Employment Services (DOES), acting as the WIOA Grant Recipient/Fiscal Agent for the District, is responsible for carrying out enrollment, monitoring and performance reporting activities as prescribed by the DC WIC, and is responsible for issuing WIOA Youth grant funds to youth service providers selected by the DC WIC.

Incentive Payments. WIOA provides for incentive payments to enrolled youth for recognition and achievement directly tied to education, training activities, and work experiences. Such incentives for achievement could include improvements marked by acquisition of a credential or other successful outcomes; as opposed to activities such as recruitment, submitting eligibility documentation, and participation in the program. DOES must have written policies and procedures in place governing the award of incentives and must ensure that such incentive payments are tied to the goals of the specific program; are outlined in writing before the commencement of the program that may provide incentive payments; align with the local program’s organizational policies; and follow all applicable rules and guidance. The activity must be posted in the case management system, and case notes must accompany the youth activity and incentive payment. If utilized by a local youth provider, incentive payments are to be provided in the manner described in DOES’s policy.

ACTION REQUESTED:

Effective immediately. Please distribute this WIGL to appropriate administrators, youth provider staff, subgrantees, and other individuals with youth program responsibility and oversight.

ATTACHMENTS:

None.

INQUIRIES:

Inquiries regarding this guidance should be directed to the DC WIC Executive Director.

EXPIRATION:

Continuing.